

The following are my comments in response to the petition filed by Jeffery C. Briggs and William R. Tippet II. I began using the 1.8-2.0 MHz amateur band (160 metres) in 1960, when usage was severely limited because the frequencies were shared with the LORAN-A radionavigation system. I continued using this band while power and frequency restrictions were gradually eased as LORAN was phased out, up to the present, with the band nearly restored to full pre-WWII amateur privileges. Throughout this period my operating activity has included CW (Morse telegraphy) and amplitude-modulated voice transmission. I have used these modes primarily for domestic contacts ("ragchewing"), as well as technical experimentation that has included development of receiving and transmitting antenna systems, weak signal reception, and perfection of home-constructed transmitting equipment capable of power outputs up to the full legal limit. I have no interest in contests, and have seldom attempted international (DX) contacts primarily because of locally noisy receiving conditions.

Under the present Rules in Part 97, as explained by Messrs Briggs and Tippet, 160M is subdivided neither by licence class nor by modes of emission. The entire band is available to licensees holding General Class privileges and higher, and amateurs may use any of the authorized modes of emission on any frequency within the band. All other U.S. amateur bands below 30 MHz are subdivided into mode-specific subbands, which are still further subdivided by licence class. Under RM-10352, the petitioners have asked the Commission to extend this complex subband system to the 1.8-2.0 MHz band, by subdividing 160 metres into mode-specific subbands.

I oppose this proposed change because I feel that the use of specific modes of emission in specific portions of the amateur bands is better left for amateur licensees to decide for themselves according to prevailing operating conditions, under volunteer band plans as already exist today. I do not believe that it would be in the public interest to use government resources to formulate and enforce additional FCC rules to govern what is essentially an internal amateur radio matter.

This rulemaking proposal is unnecessary because, as Messrs Briggs and Tippet fully admit, sharing of space by mixed mode users has served the amateur community pretty well through the years, and from my observation, continues to do so at today's activity level. While I am sympathetic to the concerns of the petitioners regarding weak signal reception, I have observed that the vast majority of users of this band have been following the proposed guidelines voluntarily, ever since the band was restored to amateurs. Most regional domestic CW contacts occur on approximately 1800-1820 kHz, while intercontinental CW contacts occur largely in the vicinity of 1830 kHz. During non-contest periods SSB or other voice modes are rarely heard below 1843 kHz. In over 20 years, I have heard voice signals below 1843 kHz during non-contest periods perhaps two or three times.

I take issue with the petitioners claims regarding the increase in activity levels on 1.8-2.0 MHz. Prior to 1970, there was very little interest in this band due to power, frequency and geographical restrictions. Amateurs in several coastal states were prohibited from using the band altogether. Most commercially manufactured amateur equipment did not include 1.8-2 MHz.

As the LORAN system began to be phased out during the 1970's, some restrictions were relaxed and the band became available in all regions of the U.S. Interest picked up, and equipment manufacturers began to include this band on more of their products. At the World Administrative Radio

Conference in 1979, LORAN-A was deleted from this portion of the spectrum and the entire 1.8-2.0 MHz band was restored to amateur use with full legal power, as the LORAN system was dismantled. Commercially built equipment, including high power amplifiers became widely available for use on this band, and there was a surge in interest, as 1.8-2.0 MHz once again took on its former status as a mainstream amateur band. Activity increased throughout the 1980's until about 1990. At that time, there was some threat that amateurs might eventually lose access to 1.9-2.0 MHz due to sharing with the Radiolocation service, but this loss has not materialized because the Global Positioning Satellite system has largely rendered 2 MHz radiolocation obsolete. Activity remained stable from 1990 to about 1995, and since 1995, I have observed a noticeable decline in activity on this band.

Activity has decreased partly because of the aging population of amateur licensees. There have not been enough newly licensed amateurs to replace those who have died or become inactive due to failing health. The peak in the solar cycle is responsible for some additional decline in activity. Others have simply lost interest. I have observed a noticeable decrease in the level of interference while operating this band in the last five years, and I have found it more difficult to establish contacts, especially on CW, due to lack of activity. At present, there are seldom more than a half dozen domestic CW contacts taking place at any given moment. When the band is open for distant propagation, a narrow band of frequencies in the vicinity of 1830 kHz may become congested by a cluster of CW stations attempting intercontinental contacts.

A notable exception to this dearth of activity is observed during over-the-air contest periods, which occur several weekends a year. During "phone" contests, the band becomes highly congested with voice contacts, all the way down to 1800 kHz. Likewise, during CW contests, the band may become highly congested with CW traffic up to approximately 1870 kHz. Contest operation, regardless of mode, tends to extend upwards from 1800 kHz. This can be very frustrating for CW operators during weekends of a phone contest, as the normal "CW" frequencies may be obliterated by voice traffic. This congestion rarely extends to the upper end of the band, so CW stations can find some relief by operating above 1900 kHz during contest periods. Likewise, during CW contests, amateurs not participating in the contest who wish to communicate by voice or CW can find an abundance of vacant frequencies above the CW contest operation.

This may be a slight inconvenience to some operators, but limited to a few weekends per year, the disruption caused by contests is not sufficient to justify permanent changes to Part 97. If there is sufficient concern throughout the amateur community, the committees that sponsor contests could resolve this problem simply by placing certain portions of the band off-limits to contest operation, and declaring that contestants who fail to observe those limits will be disqualified.

I would prefer that the 1800-2000 kHz band remain without subbands, because this allows the amateur community to make more efficient use of the band by adjusting the voluntary band plan as operating conditions evolve, without the necessity of going through a cumbersome rulemaking procedure, which can be burdensome for both the amateur community and the Commission. Furthermore, the trend worldwide is for the elimination of amateur subbands altogether. Subbands have not existed for decades in some European countries, and Canada recently deleted subbands from its amateur regulations. The U.S. may be one of very few remaining countries in the

world that subdivide their amateur bands by modes of emission or class of licence.

Even if a CW subband were deemed necessary or desirable for 160M, there is not presently enough CW activity to justify 43 kHz of restricted band space, let alone when considering the predicted decline in interest as CW licensing requirements are relaxed or eliminated in the U.S. and other countries throughout the world. A case can be made against subbands by observing the current situation in the 3.5-4.0 MHz amateur band. The CW/digital subband extends from 3.5 to 3.75 MHz, and voice is restricted to a subband from 3.75 to 4.0 MHz. Even during the peak of the winter season when atmospheric noise is minimal, there is relatively little activity in the CW portion of the band, mostly confined below 3.55 MHz. There is frequently some digital mode activity in the vicinity of 3.6 MHz, and some slow-speed CW in the old Novice subband from 3.675-3.725 MHz, but there are usually extended portions of the subband below 3.675 where there is no traffic at all. Meanwhile, the voice subbands are usually very congested, with interference that may be several layers deep. Because of subband restrictions, amateurs are not able to make the most efficient use of the 3.5-4.0 band.

I believe it would be in the public interest to maintain the present flexibility of operation in the 1.8-2.0 MHz amateur band; I therefore conclude that RM-10352 should be DENIED.

Respectfully submitted,

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